

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX

ST. CROIX RENAISSANCE GROUP, LLLP,)
BROWNFIELD RECOVERY CORP., and)
ENERGY ANSWERS CORPORATION OF)
PUERTO RICO)

Plaintiff,)

v.)

ST. CROIX ALUMINA, LLC and ALCOA)
WORLD ALUMINA, LLC,)

Defendant.)

CIVIL NO. 2004/67

ACTION FOR DAMAGES

PLAINTIFFS' MOTION TO AMEND THEIR COMPLAINT AND
ANSWER TO COUNTERCLAIM

Come now the plaintiffs, by counsel, hereby move to amend their complaint and answer to counterclaim pursuant to Rule 15 and LRCi 15.1. The basis of the motion is more fully set forth in the memorandum of law submitted in support of this motion, which is incorporated herein by reference. For the reasons set forth therein, it is respectfully submitted that the relief sought should be granted. Counsel for Brownfield Recovery Corp. has directed Joel H. Holt to file this motion electronically.

Dated: September 4, 2008

/s/Joel H. Holt

**Counsel for SCRG and
Energy Answers Corporation of PR**
2132 Company Street
Christiansted, St. Croix
USVI, 00820
(340) 773-8709

Dated: September 4, 2008

/s/ Carl J. Hartmann, III

Counsel for Brownfield Corp.
5000 Estate Coakley Bay, L6
Christiansted, St. Croix
USVI 00820
(340) 719-8941
carl@carlhartmann.com

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CERTIFICATE OF SERVICE

I hereby certify that on this September 4, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Simone R.D. Francis
The Tunick Building
1336 Beltjen Road, Suite 201
St. Thomas, Virgin Islands 00802

Paul J. Ruskin, Esq.
5000 Estate Coakley Bay, Unit L5
Christiansted, St. Croix
USVI 00820

and emailed to:

Cassandra C. Collins, Esq.
William H. Wright, Jr., Esq.
Hutton & Williams
951 E. Bryd Street
Richmond, VA 23219

/s/Joel H. Holt